

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
No. 3:14-CR-208**

**UNITED STATES OF AMERICA**

**vs.**

**PAUL BURKS**

**JOINT MOTION TO CONTINUE AND FOR STATUS HEARING**

NOW COMES the defendant Paul Burks, joined by the government, and respectfully moves this Court to continue this matter from the May term. The parties also move the Court to set this matter for a status hearing and to peremptorily set a trial date. In support of this motion, the undersigned show the Court the following:

1. Mr. Burks was named in a four-count indictment returned on October 24, 2014. He made his initial appearance on November 13, 2014, at which time he was arraigned. The Court has continued docket call in this matter three times. [Docs. 11, 24, 27]

2. Docket call is currently scheduled for May 18, 2015.

3. The parties agree a further continuance is appropriate for reasons outlined in previous motions to continue. To date, the government has produced over 7.9 million documents to the defense. The government is also in the process of producing an additional 11 terabytes of data. Potential witnesses are numerous and spread over a wide geographic area which includes other countries.

4. Given the amount of discovery involved, the degree of preparation necessary for trial, witness travel and document management issues, the parties further agree that a peremptorily set trial date is necessary.

5. While the parties agree a peremptory setting is necessary, they also disagree on the appropriate length of continuance and trial date. The parties are therefore asking the Court to set this matter for a status hearing which will allow the parties to present their respective positions, after which the Court can peremptorily set this matter for trial.

Respectfully submitted this the 7th day of May, 2015.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that s/he has served the foregoing pleading with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel for defendants:

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This the 7th day of May, 2015.

s/ Noell P. Tin \_\_\_\_\_